

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

INTELLECTUAL VENTURES I LLC AND
INTELLECTUAL VENTURES II, LLC,

Plaintiff,

vs.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 4:24-cv-00980

JURY TRIAL

DECLARATION OF CASEY SHOMAKER IN SUPPORT OF DEFENDANT
AMERICAN AIRLINES, INC.'S OPPOSITION TO MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT

I, Kenneth Scott, hereby state as follows:

1. I am an attorney at McKool Smith, P.C., and counsel for American Airlines, Inc. (“American”) in this action.

2. I provide this declaration in support of Defendant American Airlines, Inc.’s Opposition to Motion for Leave to File Amended Complaint.

3. **Exhibit A** is a true and correct copy of email exchange between Plaintiffs and Defendant’s counsel from May 21 to May 23, 2025 related to the Motion for Leave to File an Amended Complaint.

4. **Exhibit B** is a true and correct copy of an email exchange between Plaintiffs and Defendant’s counsel from June 4, 2025 related to the Proposed Scheduling Order.

5. **Exhibit C** is a true and correct copy of *Koninklijke KPN NV v. Samsung Electronics America, Inc.*, 2:14-cv-01165-JRG, Dkt. 58 (E.D. Tex. Jul. 28, 2015).

6. **Exhibit D** is a true and correct copy of *DietGoal Innovations LLC v. Arby’s*

Restaurant Group, Inc., 2:11-cv-00418-CMC, Dkt. 445 (E.D. Tex. May 24, 2012).

7. **Exhibit E** is a true and correct copy of *SynQor Inc. v. Vicor Corp.*, No. 2:14-CV-00287-RWS-JBB, Dkt. 565 (E.D. Tex. Sep. 13, 2022).

8. **Exhibit F** is a true and correct copy of *Barkan Wireless Access Techs., L.P. v. Cellco P'ship*, No. 2:16-CV-00293-JRG-RSP, Dkt. 43 (E.D. Tex. Feb. 27, 2017).

9. **Exhibit G** is a true and correct copy of *Quantum World Corp. v. Atmel Corp.*, No. 2:07-CV-24-CE, Dkt. 175 (E.D. Tex. Nov. 26, 2008).

10. **Exhibit H** is a true and correct copy of *Nagravision SA v. Comcast Corp.*, 2:16-cv-01362-JRG, Dkt. 123 (E.D. Tex. Sept. 20, 2017).

11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of June 2025 in Dallas, Texas.

/s/Casey Shomaker
Casey Shomaker